

# **EXHIBIT 2**

**Jeff Nardinelli**

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**From:** Jeff Nardinelli  
**Sent:** Wednesday, April 12, 2017 7:37 AM  
**To:** Gonzalez, Arturo J.; UberWaymo  
**Cc:** QE-Waymo  
**Subject:** RE: Waymo v. Uber, No. 17-cv-00939, PROD008  
**Attachments:** Waymo Privilege Log (Brown - Updated).pdf

Arturo,

As stated, we redacted/withheld Mr. Brown's notes to the extent they reflect any investigation beyond the scope of his declaration. Please find attached an updated privilege log for Mr. Brown. The final two items relate to Mr. Brown's notes.

Thanks,  
Jeff

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**From:** Gonzalez, Arturo J. [mailto:AGonzalez@mofo.com]  
**Sent:** Tuesday, April 11, 2017 6:10 PM  
**To:** Jeff Nardinelli <jeffnardinelli@quinnemanuel.com>; UberWaymo <UberWaymo@mofo.com>  
**Cc:** QE-Waymo <qewaymo@quinnemanuel.com>  
**Subject:** Waymo v. Uber, No. 17-cv-00939, PROD008  
**Importance:** High

Jeff,

What specific notes you have withheld? Please provide us with a log of those withheld notes. The second document (4332) is almost entirely redacted. Why is that?

**Arturo J. González**  
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**From:** Jeff Nardinelli [mailto:jeffnardinelli@quinnemanuel.com]  
**Sent:** Monday, April 10, 2017 3:51 PM  
**To:** UberWaymo  
**Cc:** QE-Waymo  
**Subject:** Waymo v. Uber, No. 17-cv-00939, PROD008

- External Email -

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Arturo,

Per and consistent with our discussion this morning, I have attached notes from Mr. Brown as Uber has requested. The production of the notes concerns and is limited to the disclosures in his declaration regarding the investigations addressed therein. This production is without waiver of and without prejudice to any other

work product protection/privilege. To the extent his notes reflect any other investigation beyond the scope of his declaration, that material has been redacted/withheld as work product.

Thanks,  
Jeff

**Jeff Nardinelli**  
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